

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NEBRASKA

FILED
U.S. DISTRICT COURT
DISTRICT OF NEBRASKA
2021 APR 22 PM 4:30
OFFICE OF THE CLERK

UNITED STATES OF AMERICA,

Plaintiff,

vs.

LUIS ALBERTO CASTRO-SANTOS,
TOMAS DE LA CRUZ-PEREZ, MARTIN
ALONZO CASTRO, and ESTUARDO
HERNANDO RUIZ-OROZCO,

Defendant.

8:21CR112

INDICTMENT

18 U.S.C. §§ 1028(a)(1)-(3) & (f)
42 U.S.C. § 408(a)(7)(C)
18 U.S.C. § 2
18 U.S.C. §§ 1028(b)(5) & (g)
18 U.S.C. § 982

The Grand Jury charges that

COUNT I

Beginning on or about an unknown date but at least as early as in May, 2020, and continuing to in or about April, 2021, in the District of Nebraska and elsewhere, the defendants LUIS ALBERTO CASTRO-SANTOS, TOMAS DE LA CRUZ-PEREZ, MARTIN ALONZO CASTRO, and ESTUARDO HERNANDO RUIZ-OROZCO, knowingly and willfully conspired together and with other persons, both known and unknown to the Grand Jury, to commit the following offenses:

1. to knowingly and without lawful authority produce identification documents, authentication features, and false identification documents, and
2. to knowingly transfer identification documents, authentication features, and false identification documents knowing that such documents and features were stolen and produced without lawful authority, and

3. to knowingly possess with intent to use unlawfully and transfer unlawfully five or more identification documents, authentication features, and false identification documents.

OBJECTS OF THE CONSPIRACY

It was a part of the conspiracy that that defendants TOMAS DE LA CRUZ-PEREZ, MARTIN ALONZO CASTRO, and ESTUARDO HERNANDEZ RUIZ-OROZCO, would obtain and sell false identification documents including state identification and driver's licenses, Social Security Cards, Lawful Permanent Resident Cards (I-551s), and birth certificates, to customers in the District of Nebraska. It was further part of the conspiracy that defendant LUIS ALBERTO CASTRO-SANTOS, residing in California, would supply false identification documents to other members of the conspiracy by shipping them using the United States Postal Service for distribution to customers. It was part of the conspiracy that members of the conspiracy provided false identification documents using biographical data and photos provided by customers.

All in violation of Title 18, United States Code, Sections 1028(a)(1)-(3) & 1028(f).

COUNT II

A. On or about June 21, 2020, in the District of Nebraska, the defendant, TOMAS DE LA CRUZ-PEREZ, did possess a Social Security Card or counterfeit Social Security Card, to wit: a purported Social Security Card in the name of A.G.M. with the Social Security Number XXX-XX-XX39, with the intent to sell it.

B. The above violation was committed and carried out in the course of and in furtherance of the conspiracy set forth in Count 1 of this Indictment, while TOMAS DE LA CRUZ-PEREZ, ~~and~~ LUIS ALBERTO CASTRO-SANTOS, were members of the conspiracy.

MARTIN ALONZO CASTRO + ESTUARDO
HERNANDEZ
RUIZ-OROZCO

(CLP)

In violation of Title 42, United States Code, Section 408(a)(7)(C) and Title 18, United States Code, Section 2.

COUNT III

A. On or about October 15, 2020, in the District of Nebraska, the defendant, ESTUARDO HERNANDEZ RUIZ-OROZCO, did possess a Social Security Card or counterfeit Social Security Card, to wit: a purported Social Security Card in the name of R.R.R. with the Social Security Number XXX-XX-XX58, with the intent to sell it.

B. The above violation was committed and carried out in the course of and in furtherance of the conspiracy set forth in Count 1 of this Indictment, while LUIS ALBERTO CASTRO-SANTOS, TOMAS DE LA CRUZ-PEREZ, MARTIN ALONZO CASTRO, and ESTUARDO HERNANDO RUIZ-OROZCO were members of the conspiracy.

In violation of Title 42, United States Code, Section 408(a)(7)(C) and Title 18, United States Code, Section 2.



COUNT IV

A. On or about February ²²24, 2021, in the District of Nebraska, the defendant, MARTIN ALONZO CASTRO, did possess a Social Security Card or counterfeit Social Security Card, to wit: a purported Social Security Card in the name of H.R.C. with the Social Security Number XXX-XX-XX66, with the intent to sell it.

B. The above violation was committed and carried out in the course of and in furtherance of the conspiracy set forth in Count 1 of this Indictment, while LUIS ALBERTO CASTRO-SANTOS, TOMAS DE LA CRUZ-PEREZ, MARTIN ALONZO CASTRO, and ESTUARDO HERNANDO RUIZ-OROZCO were members of the conspiracy.

In violation of Title 42, United States Code, Section 408(a)(7)(C) and Title 18, United States Code, Section 2.

FORFEITURE ALLEGATION

1. The allegation contained in Count I is hereby realleged and incorporated by reference for the purpose of alleging forfeiture pursuant to Title 18, United States Code, Sections 1028(b)(5) & (g), Title 18, United States Code, Section 982 and Title 21, United States Code, Section 853.

2. As a result of the foregoing offenses, defendants LUIS ALBERTO CASTRO-SANTOS, TOMAS DE LA CRUZ-PEREZ, MARTIN ALONZO CASTRO, and ESTUARDO HERNANDO RUIZ-OROZCO, shall forfeit to the United States any personal property used or intended to be used to commit said offenses, and any property constituting, or derived from, proceeds the defendants obtained directly or indirectly as the result of the violations of Title 18, United States Code, Section 1028, including, but not limited to, the following property:

a. Approximately \$17,561.00 in United States Currency, seized on or about April 14, 2021, from the residence at [STREET NUMBER REDACTED] Johnson Street, in Wakefield, Nebraska.

b. Approximately \$9,170.00 in United States Currency, seized on or about April 14, 2021, from the residence at [STREET NUMBER REDACTED] S. Broad St, [UNIT REDACTED], in Fremont, Nebraska.

c. Approximately \$1,275.00 in United States Currency, seized on or about April 14, 2021, from the person of defendant TOMAS DE LA CRUZ-PEREZ.

d. Approximately \$3,600.00 in United States Currency, seized on or about April 14, 2021, from the residence at [STREET NUMBER REDACTED] N. Main Street, in Fremont, Nebraska.

e. A Money Judgment against the Defendants in favor of the United States:

i. a sum of money equal to the value of the property constituting, or derived from, any proceeds Defendants obtained, directly or indirectly, as a result of the offenses alleged in Count I.

3. If any of the property described above, as a result of any act or omission of the Defendants:

- a. cannot be located upon the exercise of due diligence;
- b. has been transferred or sold to, or deposited with, a third party;
- c. has been placed beyond the jurisdiction of the court;
- d. has been substantially diminished in value; or
- e. has been commingled with other property which cannot be divided without

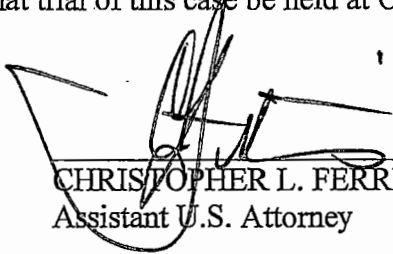
difficulty, the United States of America shall be entitled to forfeiture of substitute property pursuant to Title 18 United States Code, Section 982(b) and Title 21, United States Code, Section 853(p).

All in violation of Title 18, United States Code, Sections 1028(b)(5) & (g), and Title 18, United States Code, Section 982.

A TRUE BILL:

FOREPERSON

The United States of America requests that trial of this case be held at Omaha, Nebraska, pursuant to the rules of this Court.


CHRISTOPHER L. FERRETTI
Assistant U.S. Attorney